

Exhibit 2

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF WISCONSIN
3

4 ANDREW L. COLBORN,)
5 Plaintiff,) Case No.
6 vs.) 19-cv-0484
7 NETFLIX, INC., et al.,)
8 Defendants.)
9
10
11

12 CONFIDENTIAL
13 VIDEOTAPED DEPOSITION OF ADAM DEL DEO
14 April 26, 2022
15
16
17
18
19

20 REPORTED REMOTELY BY:
21 AMBER S. WILLIAMS, C.S.R. No. 1080
22 Notary public
23
24
25

1 THE VIDEOTAPED DEPOSITION OF Adam Del Deo
2 was taken on behalf of the defendants via
3 videoconference, commencing at 10:57 a.m. on
4 April 26, 2022, before Amber S. Williams via
5 videoconference, Certified Shorthand Reporter and
6 Notary Public within and for the State of Idaho, in
7 the above-entitled matter.

APPEARANCES:

8
9 For Plaintiff via videoconference:

10 SCHOTT, BUBLITZ & ENGEL, S.C.

11 BY: APRIL BARKER

12 640 West Moreland Boulevard

13 Waukesha, Wisconsin 53188-2422

14 abarker@sbe-law.com

15 -AND-

16 GRIESBACH LAW OFFICES, LLC

17 BY: MICHAEL GRIESBACH

18 830 North 12th Street

19 Manitowac, Wisconsin 54220

20 attymgriesbach@gmail.com
21
22
23
24
25

1 For Defendant Netflix:

2 BALLARD SPAHR

3 BY: LEITA WALKER

4 BY: MATHEW E. KELLEY

5 2000 IDS Center

6 80 South 8th Street

7 Minneapolis, Minnesota 55402-2119

8 walker1@ballardspahr.com

9 kelley@ballardspahr.com

10 -AND-

11 IN-HOUSE COUNSEL FOR NETFLIX

12 BY: MINDY LEMOINE

13 5805 West Sunset Boulevard

14 Los Angeles, California 90028-6607

15 mindse@yahoo.com

16 For defendants Chrome Media, Laura Ricciardi, and
17 Moira Demos via videoconference:

18 JASSY VICK CAROLAN, LLP

19 BY: KEVIN VICK

20 BY: MEGHAN FENZEL

21 355 South Grand Avenue, Suite 2450

22 Los Angeles, California 90071

23 kvick@jassyvick.com

24 mfenzel@jassyvick.com

25

Also Present:

Moira Demos, via videoconference

Laura Ricciardi, via videoconference

Deborah Bursik, via videoconference

Mehran Khatchadorian, videographer

1 Q. And you said "help support those films
2 and series," I believe, correct?

3 A. Correct.

4 Q. And what kind of support was provided to
5 the films and series in your capacity as director of
6 content?

7 A. I'm going to say -- I would say a wide
8 range of support but trying to provide the resources
9 to them, and opinions, counsel, to help them see
10 their visions through.

11 Q. Did you typically screen different
12 versions of documentaries in that capacity?

13 MS. WALKER: Objection. Vague.

14 You can answer if you understand the
15 question.

16 THE WITNESS: Yes.

17 Q. (BY MS. BARKER): Okay. With respect to
18 documentary support that you were providing, was that
19 provided in the form of written notes and
20 communications?

21 A. It depended on the project, but at
22 times, yes.

23 Q. So is there -- or, strike that.

24 Was there any kind of standard as far as
25 how many showings, or screenings, you needed to see

1 with respect to a documentary that was in development
2 or was that a case-by-case basis?

3 A. It was case by case. But I would say
4 if -- there wasn't a standard, but I would say,
5 generally speaking, it would be between three and
6 four cuts.

7 Q. Thank you. And I may have misused a
8 term there. Is -- "development" is not the right
9 word. Is "production" the right word?

10 MS. BARKER: Objection to form. Vague.

11 But you can answer if you understand.

12 THE WITNESS: Maybe just re-ask the question.
13 I don't remember.

14 Q. (BY MS. BARKER): Sure. I'll strike
15 that.

16 Is "development" or "production" the
17 right word for your work on preparing a documentary
18 series?

19 A. It's both. So the development phase
20 would be that there's an idea that a filmmaker would
21 bring to us and we're not certain yet it would be
22 something that we would move forward with. So,
23 there's a period of trying to put the project
24 together to give us more clarity as to what we think
25 it would end up being, and -- so it's a phase to give

REPORTER'S CERTIFICATE

Page 181

I, Amber S. Williams, CSR NO. 1080,
Certified Shorthand Reporter, certify:

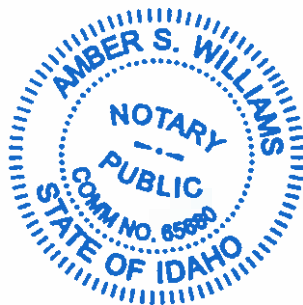
That the foregoing proceedings were taken
before me at the time and place therein set forth, at
which time the witness was put under oath by me.

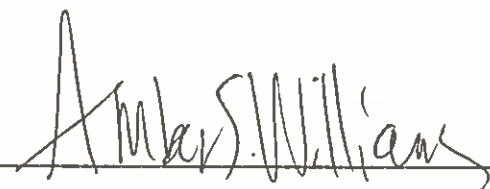
That the testimony and all objections made
were recorded stenographically by me and transcribed
by me or under my direction.

That the foregoing is a true and correct
record of all testimony given, to the best of my
ability.

I further certify that I am not a relative
or employee of any attorney or party, nor am I
financially interested in the action.

IN WITNESS WHEREOF, I set my hand and seal
this _____ day of _____, _____.





AMBER S. WILLIAMS, CSR NO. 1080

Notary Public

Post Office Box 2636

Boise, Idaho 83701-2636

My commission expires June 1, 2027